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RICHARD R. WILSON, P.C.

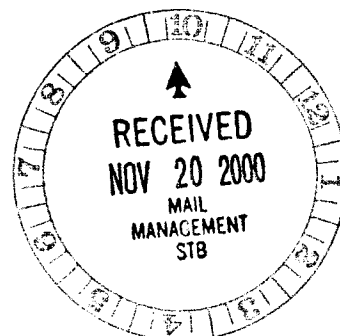
**Attorney at Law
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Of Counsel to:
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November 17, 2000

VIA FEDERAL EXPRESS

Surface Transportation Board
Case Control Unit
ATTN: Mr. Robert Link
1925 K Street, N.W.
Washington, DC 20423-0001



Re: STB Ex Parte No: 582 (Sub No 1) Major Rail Consolidation Proceedings;
Comments of the House Transportation Committee of the Commonwealth
of Pennsylvania

Dear Mr. Link:

Enclosed is a disk formatted with Microsoft Word 7.0 containing Comments of the House Transportation Committee which was erroneously omitted from our submission of November 16, 2000.

Thank you for your attention to this matter.

Very truly yours,

RICHARD R. WILSON, P.C.

Richard R. Wilson
Attorney for the House Transportation Committee
of the Commonwealth of Pennsylvania

RRW/klh
Enclosure

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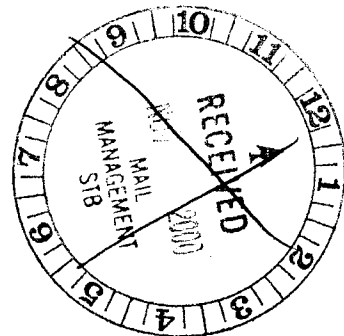
(412) 471-4477 FAX

November 16, 2000

Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

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Re: STB Ex Parte No: 582 (Sub No 1) Major Rail Consolidation Proceedings;
Comments of the House Transportation Committee of the Commonwealth
of Pennsylvania

Dear Secretary Williams:

Please place the undersigned on the service list in the above captioned proceeding. I represent the House Transportation Committee of the Commonwealth of Pennsylvania. Copies of this correspondence have been served on all parties of record.

Very truly yours,

RICHARD R. WILSON, P.C.

Richard R. Wilson

RRW/klh

xc: All Parties of Record

RICHARD R. WILSON, P.C.

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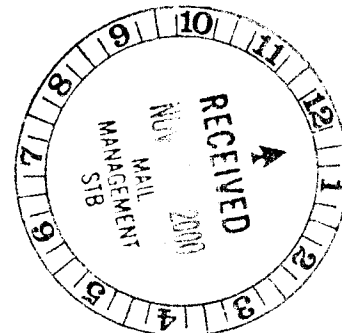
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Re: STB Ex Parte No: 582 (Sub No 1) Major Rail Consolidation Proceedings;
Comments of the House Transportation Committee of the Commonwealth
of Pennsylvania

Dear Secretary Williams:

This letter is submitted to the Surface Transportation Board by the House Transportation Committee of the Commonwealth of Pennsylvania ("Pa HTC") in response to the Board's request for comments on the proposed new rules for major rail consolidation proceedings. The Pa HTC has been actively involved through legislative hearings, constituent contacts, dialogue with Class I, regional and short line carriers and ongoing projects with various rail shippers throughout the Commonwealth as part of the acquisition of Conrail lines by Norfolk Southern Corporation and CSX Transportation, Inc. We have witnessed the reduction in competitive routing alternatives, service disruptions, refusal to abide by competitive interchange agreements with Pennsylvania short lines and major operational problems flowing from the Conrail acquisition transaction.

Accordingly, the Pa HTC has reviewed carefully and with great interest the new proposed procedures for major rail consolidations issued by the Board as well as the comments of interested parties which were contained in the Board's decision of October 3, 2000.

While the Committee applauds the Board's increased focus on enhancement of competition as an offset to negative impacts resulting from service disruption and competitive harms caused by merger transactions, it does not believe that the proposed regulations contain effective or adequate remedial measures to address those problems. In particular, the Pa HTC believes that the proposed regulations do not contain provisions that provide for meaningful competitive access for regional and short line

Vernon A. Williams, Secretary
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carriers to competing Class I railroad connections. Nor do the proposed regulations affirmatively reject efforts by merged carriers to maintain barriers to competitive interchange or the preservation of competitive gateways to connecting carriers.

The Pa HTC further believes that the "Bill of Rights" proposed by the American Short Line and Regional Railroad Association and comments submitted by various coal interests including the PPL Companies should be adopted and incorporated into the Board's Major Rail Consolidation Procedures.

Finally, the Board's consolidation procedures should also adopt expedited measures for connecting carriers and shippers to recover financial damages caused by service disruptions and other operational problems resulting from ineffectively implemented transaction.

The Pa HTC respectfully requests that the Board take these matters into consideration and looks forward to further participation in the reply and rebuttal stages of this proceeding.

Verifications from the Committee Chairmen will be forwarded under separate cover.

Very truly yours,

RICHARD R. WILSON, P.C.

A handwritten signature in black ink, appearing to read 'Richard R. Wilson', with a long horizontal flourish extending to the right.

Richard R. Wilson
Attorney for the House Transportation Committee
of the Commonwealth of Pennsylvania

RRW/klh

xc: All Parties of Record